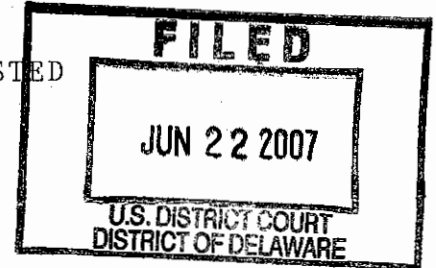


UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

GEORGE A. JACKSON, et al., :  
Plaintiffs, :  
v. : C.A. No. 05-823-\*\*\*  
STANLEY TAYLOR, et al., : JURY TRIAL REQUESTED  
Defendants. :



MOTION FOR DEFAULT JUDGMENT

Plaintiff, George A. Jackson, et al., moves the Court to enter a default judgment against defendants, and states:

1. Plaintiff George A. Jackson, filed a civil "class" action complaint that was signed by numerous of inmates-plaintiffs attached to the complaint.<sup>1</sup>
2. Plaintiff, George A. Jackson, was actively conducting discovery to keep the case moving forward based on the orders left by Judge Kent A. Jordon before he vacated his position.
3. Defendants' attorney has repeatedly chiled Jackson for filing discovery pleadings in this case, in which is clearly express in Defendants' Response pleadings.
4. Plaintiff, George A. Jackson, file a motion for permission to enter and inspect the main kitchen. Defendants' adamantly opposed Jackson's request. In fact, an affidavit by "new" Warden Mike Deloy was attached to the Defendants' Response, which also showed his displeasure towards Jackson pleadings.
5. Within the next few weeks, representatives of the Defendants seized all of Jackson's legal material after reading through it during a cell search.

---

<sup>1</sup>. Plaintiff Jackson is unable to indicate the docket entry number to any of the filed documents in this motion. I have not obtained the docket sheet that was confiscated by the representatives of the Defendants.

Also during the reading of Jackson's legal material, it was discovered that he had several legal documents of inmates' cases he was working on.

6. Despite there was no posted institutional rule or directive which actually forbade inmates from helping other inmates with there case, I received a disciplinary conviction.<sup>2</sup>

7. On June 8, 2007, after my appeal was denied, Lt. Hollis returned to me a small portion of my legal material, and told me I would have to contact Staff/Lt. Johnson in order to obtain anymore of my legal material.

8. I wrote to Staff/Lt. Johnson explaining the need of the rest of my legal material, but he denied my request while indicating I had all my legal materials that are of pending nature. ATTACHED Exhibit "A" and "B"

9. Mr. Jackson was a direct victim of a conspiratorially planned by representatives of the Defendants' aim of retaliation for filing the pending civil "class" action claim against the numerous of Defendants (12) of the Department of Corrections.

10. The civil "class" action about the inadequate ventilation system at the S.C.I main kitchen, was brought in good faith and could bring about a better sanitary and health change for the entire prison population (including the DOC staff would are assigned over/time that received meals from the kitchen).

11. Plaintiff, George A. Jackson, was retaliated as foresaid through the willful and malicious actions of the Representatives of the Defendants'. The said retaliation was carried out to obstruct Jackson's court access, to deter other inmates from filing against DOC officials, harass, intimidate, and otherwise coerce Mr. Jackson. The conspiratorially planned seizure of all my legal material was initiated by some Defendants or Representatives of the

<sup>2</sup> "Possession or control of any contraband which by its nature does not present a substantial threat to safety of person within the institution. This also includes, but is not limited to any article of clothing which is not specifically authorized to be worn and excessive accumulation of unauthorized items. After November, 2002, cigarettes and other smoking materials.

Defendants while acting within the scope of their employment. It was done despite knowing Jackson was the representative plaintiff.

12. That as a result of said retaliation, Mr. Jackson has suffered mental anguish, embarrassment, shame, humiliation, loss of property, and inability to adequately continue his litigation in this pending case.

WHEREFORE, the Plaintiff, George A. Jackson, et al, demands default judgment against the Defendants in the sum of One Hundred (\$100,000.00) Dollars compensatory damages, One Hundred (\$100,000.00) Dollars punitive damages, plus an injunction ordering Defendants' for immediately arrange for air condition cool SCI (prison) kitchen unit.

6/20/07

*Charles F. Blizard*  
*Dennis Young*  
*George A. Jackson*  
George A. Jackson, et al  
Sussex Correctional Inst.  
P.O. Box 500  
Georgetown, DE 19947

CERTIFICATE OF SERVICE

I hereby certify that on June 20<sup>th</sup>, 2007, I filed Motion For Default Judgment, by placing said document in the S.C.I. prison mailbox to be forward to;

Eileen Kelly  
Deputy Attorney General  
Department of Justice  
820 N. French St., 6th Floor  
Wilmington, DE 19801

Charles F. Blizzard  
Donna Young  
George A. Jackson

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

GEORGE A. JACKSON, et al., :  
 :  
 Plaintiffs :  
 :  
 v. : C.A. No. 05-823-\*\*\*  
 :  
 STANLEY TAYLOR, et al., : JURY TRIAL REQUESTED  
 :  
 Defendants. :

NOTICE OF MOTION FOR DEFAULT JUDGMENT

To: Stanley Taylor, et al.

Please take notice that Plaintiffs will make application to the Court,  
at the convenience of the Court to be heard for entry of a default judgment  
in favor of plaintiffs and against Defendants, followed by a hearing to  
determine damages.

*Charles F. Blyzard*  
*Carol Young*  
*George A. Jackson*  
George A. Jackson  
SBI#00171250  
P.O. Box 500  
Georgetown, DE 19947

DATED:

6/20/07

George A. Jackson  
SBI#00171250  
Merit: West

June 10, 2007

Staff/Lt. Joseph H. Johnson  
Class I Hearing Officer  
Sussex Correctional Institution

RE: Confiscated Legal Materials

Dear Staff/Lt. Johnson:


On or about May 30, 2007, all my pending legal documents and materials which is crucial and essential to my pending litigation (Jackson, et al., v. Taylor, et al., C.A. No. 05-823-\*\*\* ) and contemplated appeal (Jackson v. Ivens, et al., No-1977, U.S. Court of Appeals), was confiscated by shakedown team.

After receiving a disciplinary report and found guilty, Lt. Hollis brought a stack of legal documents to me. After telling him of documents and materials that was missing, he told me I would have to contact you.

Here are the basis of my legal material I am still missing:

- 1) Still missing numerous of legal documents from both my pending civil "class" action litigation, and my pending civil action that on appeal;
- 2) My legal book, "Represent Yourself In Court";
- 3) Prison Legal News volumes (paid subscription); and
- 4) 15-20 paid missionary envelopes.

Please return these materials to me as soon as possible without unnecessary delay or denial.

  
George A. Jackson  
SBI#00171250  
Merit: West

DATED:

6/10/2007

EXHIBIT "A"

Mr. George Jackson, SBI 00171250

RE: Legal paper work.

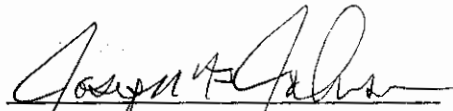
On June 7<sup>th</sup> I directed Lt. Hollis, to remove all confiscated legal work pertaining to your disciplinary case, which were placed in evidence, and to return all documents to the proper owners. He has assured me, as of this date, he has returned all legal materials that are of a pending nature.

According to your letter dated June 10<sup>th</sup>. You claim to be still missing some items.

I believe there are not located in evidence and you will need to use this letter to process this matter through the grievance process to see where these missing items are located.

Hopefully this will clear up this matter.

Thank you for the letter



S/Lt. Joseph H Johnson  
SCI Class 1 Hearing Officer.

CC: Warden, Mike Deloy  
Maj. Melvin Hennessy  
S/Lt. Derrick West  
Lt. J Hollis

EXHIBIT "B"

I/M: GEORGE A. JACKSON  
BLDG: MORT  
SUSSEX CORRECTIONAL INSTITUTION  
P.O. BOX 500  
GEORGETOWN, DELAWARE 19947

1037 U.S. POSTAGE PB2230370  
7934 \$00.580 JUN 21 07  
5687 19947

U.S. District Court  
Lockbox 18  
844 N. King St  
Wilmington, DE 19801  
U.S.M.S.

19801\$3519 C012

